

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendments of Parts 2, 15, 18 and Other) ET Docket No. 97-94
Parts of the Commission's Rules to Simplify)
and Streamline the Equipment Authorization)
Process for Radio Frequency Equipment)

To the Commission:

COMMENTS OF HEWLETT-PACKARD COMPANY

Hewlett-Packard Company ("HP"), pursuant to Section 1.415 of the Commission's Rules, hereby submits its comments on the *Notice of Proposed Rule Making* ("NPRM") in the above-captioned proceeding.¹ HP concurs in the comments submitted by the Information Technology Industry Council ("ITI"), of which it is a member, but wishes to add the following comments.

HP supports the Commission's dedication to the streamlining of equipment authorization procedures, so that authorization adds no more time or expense than is necessary to the increasingly time-constrained process of introducing new and compliant equipment. This dedication has been evident in the creation of the Declaration of Conformity ("DoC") authorization procedure in ET Docket No. 95-19,² and now in the present proceeding.

Unfortunately, the introduction of international trade issues into the test laboratory accreditation requirement of the DoC procedure has prevented this authorization procedure from being as successful as it needs to be. The limitation in the note to Section 2.948(d) of the Commission's Rules on the accreditation of test labs outside the United State has contributed to making it burdensome for many manufacturers and suppliers to use the DoC procedure instead of certification. Indeed, the continued availability of the

¹ Released March 27, 1997, FCC 97-84.

² *Report and Order*, ET Docket No. 95-19, 11 FCC Rcd. 17,915 (1996), In the Matter of Amendment of Parts 2 and 15 of the Commission's Rules to Deregulate the Equipment Authorization Requirements for Digital Devices.

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certification procedure for Class B personal computers and peripherals authorized under Part 15 has been vital to HP's business, despite the burden of submitting applications and awaiting a grant of authorization. Frankly, because of the time and uncertainty involved in negotiating, concluding and awaiting the entry into force of formal mutual recognition agreements ("MRA's") with many governments, the Commission should not solely rely on any authorization procedure, such as DoC, that is dependent for its success on such agreements.

In the long term, true streamlining and simplification of equipment authorization cannot be limited to the United States alone. A multitude of "streamlined" authorization procedures established by different national governments will not yield the full benefits that the Commission is attempting to provide in this and related proceedings. These benefits will ultimately result from the adoption of common procedures and documentation by many nations, so that a product's conformance can be established simply and globally. HP therefore urges the Commission to further pursue streamlining of equipment authorization procedures by participating along with industry and agencies of other governments in international forums, such as IEC, CISPR and CASCO, to establish common attributes for authorization procedures. For example, in the case of the DoC procedure, those common attributes may be product manual, DoC and compliance folder content, as well as product marking. Furthermore, in eliminating certain authorization procedures as part of this or future proceedings, the Commission should also consider whether the remaining procedures are consistent with likely international approaches to equipment authorization.

Consistent with these views, HP makes the following specific comments.

1. HP supports the Commission's proposal in paragraph 12 of the NPRM to maintain separate verification and DoC procedures for the present time. The Commission's proposal will facilitate the development of internationally acceptable equipment authorization procedures, which may be more consistent with one or the other of these two procedures.
2. HP opposes the Commission's proposal in paragraph 22 of the NPRM to stop accepting applications for certification of personal computers and peripherals within two years. As discussed previously, Section 2.948 of the Commission's Rules make it difficult, if not impossible, for test labs in foreign countries to be accredited to perform testing for DoC's. Therefore, the Commission should not eliminate certification as an option for personal computers and peripherals until either (a) the MRA's required by this regulation enter into force in the vast majority of countries where this equipment is manufactured and tested, or (b) the regulatory restrictions on the accreditation of foreign test laboratories by any competent accrediting body are eliminated. Furthermore, because the length of time needed to accomplish either of these actions is uncertain, the Commission

should not consider a transition period to phase out certification for personal computers and peripherals until the constraints on foreign test labs are eliminated.

Respectfully submitted,

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